Craighead Wildlife-Wildlands Institute

5200 Upper Miller Creek Road • Missoula, Montana 59803 • (406) 251-3867 • Fax (406) 251-5069

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Dr. Christopher Servheen
Bitterroot Grizzly Bear EIS Team Leader
U.S. Fish and Wildlife Service
P.O. Box 5127
Missoula, MT 59806

Dear Chris,

Please consider the following comments and recommendations regarding the "Draft Environmental Impact Statement for Grizzly Bear Recovery in the Bitterroot Ecosystem." Among existing options, we support reintroduction under Alternative 4. We base this position on our opposition on philosophical and scientific grounds to management by a local citizen committee and our evaluation of a nexus of habitat-related issues over which Alternative 4 and Alternative 1 differ.

I. Management and Advisory Structure

We object to delegating management authority to a local citizen committee as specified in Alternative 1 for two main reasons:

1 (1) The lands in question are not owned by individuals but are held in trust by all citizens of the United States. Although local economies are more directly affected by local land-use policy, resident individuals and businesses involved in, for example, resource extraction in the Salmon-Selway are in effect leasing their use of these lands from the national public. Therefore, any citizen participation in recovery (whether advisory or otherwise) must be national in representation and should not include those with direct economic interests in these lands.

2 (2) Grizzly bear recovery in the Salmon-Selway is not a routine technical procedure that may be handed over to a lay committee. Rather, it is grand national experiment that will test the skills of our best scientific and resource policy professionals. No matter how committed to restoration or how accomplished in their own fields these individuals prove to be, a lay committee cannot identify and keep pace with the best available science in all disciplines (genetics, demography, remote sensing, plant ecology, ecological economics, etc.) pertinent to reintroduction. Nor is such a committee likely to identify the need to *develop* the best "available" science as new and unexpected issues and challenges present themselves during the process of recovery.

We do not agree with those who suggest that the southern portion of the Salmon-Selway *must* contribute little to recovery because salmon are largely absent (also true in the northern portion), whitebark pine will decline and/or dryness and granitic soils reduce plant productivity, particularly for berry producing species. We do agree that these factors may ultimately limit bear density in the south below that observed in the Northern Continental Divide Ecosystem. However, we point out that (1) the south has the largest total area of defacto wilderness fringing the designated wilderness core and that low road density is an accepted feature of high quality bear habitat, and (2) relatively small patches of mesic forest (with beargrass, huckleberry, grouse whortleberry, etc. in the understory) and riparian ribbons (having sedges, currants, thimbleberry, serviceberry, etc.) embedded in a more xeric matrix may, over this large area, sum to significant acreages of well-dispersed, high-quality, food-defined grizzly habitat.

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We also note that similar comments about food resource availability might be made regarding habitat quality in the Greater Yellowstone Ecosystem, yet no one would argue that this ecosystem contributes little to the recovery of bears in the Northern Rockies as a whole. The issue of habitat quality and quantity in the south or elsewhere in the Salmon-Selway ecosystem can be decided only by detailed ecological inventory.

Legal status of the introduced population: We think that full protection for the grizzly as a threatened species under the ESA is crucial to successful reintroduction. Because resource extraction may proceed, under Alternative 1, without formal Section 7 consultation, it is inevitable that significant amounts of bear habitat *will* be compromised or destroyed without adequate prior evaluation of the consequences of habitat alteration for successful reintroduction. Even in ideal circumstances, the transplant of only 25-30 bears will carry a high risk of failure simply from the genetic and demographic stochasticities unique to very small populations. Reducing options for the designation of critical bear habitat over large areas of the ecosystem (via the proposed rule change) can only further handicap the already daunting task of grizzly restoration.

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Linkage zones: The Grizzly Bear Recovery Plan (1993) recognizes the importance of establishing linkage zones between recovery areas and states that, "It is essential that existing options for carnivore movement between existing ecosystems be maintained while the (five-year) evaluation of linkage zones is underway." Alternative 1, unlike Alternative 4, contains no mention of linkage zones. Furthermore, because Alternative 1 calls for a much smaller recovery area and limited options for habitat protection in areas surrounding the recovery core, reintroduction under Alternative 1 dictates that any future effort to establish linkages will require plans for longer corridors and more habitat restoration within linkage zones. This, in turn, means a reduced likelihood that functional linkages can in fact be established.

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We recommend that in the process of setting recovery area boundaries by ecological criteria (above), special attention be given to evaluating the potential for defacto roadless and multiple-use public lands in the southeast and north of the ecosystem to act as *foundations* for residential and/or movement corridors connecting the Salmon-Selway to the Greater Yellowstone Ecosystem and recovery areas to the north, respectively.

6 We realize that, under Alternative 1, all actions of the citizen committee must lead to recovery and that the Secretary of the Interior may resume management responsibility if he/she deems those actions inadequate for recovery. But what will be the lag time between such errors and their correction? And what is the likelihood that legal challenges over a disbanding of the committee will occur and further delay corrective action?

We have no objection to encouraging citizen involvement in endangered species recovery programs. In fact, we applaud the USFWS for its willingness to increase private sector involvement in the recovery process. Some of the ESA's most notable successes (e.g., the peregrine falcon) owe much to the efforts of the civilian *proponents* of recovery.

However, we think that the citizen committee specified by Alternative 1 could set a damaging precedent for resource management on our public lands. We suggest that you:

7 (I) retain management oversight and authority with the USFWS,

(ii) establish and substantively involve an advisory committee of independent scientists selected from a range of appropriate disciplines (as outlined in Alternative 4), and

(iii) similarly establish and involve a citizen advisory committee selected to represent both the national and regional population on issues for which such individuals may reasonably be regarded as experts.

More generally, we recommend a more considered and formal *national* discussion to evaluate the pros and cons of shifting federal management responsibility to local citizen committees.

II. Habitat Considerations

8 **Location and size of the recovery area:** Recovery area boundaries should be defined in the final action by explicit ecological criteria and not, as in Alternative 1, by arbitrary administrative boundaries. That is, boundaries should be defined by an informed consideration of how grizzlies can be expected to use the *entire* Salmon-Selway landscape in view of the spatial distribution of bear foods and other key habitat features (denning sites, road densities, etc.). Although Davis and Butterfield's (1991) early habitat evaluation was helpful in moving the idea of reintroduction forward, their inventory is not adequate to this task in large part because it is not sufficiently detailed and it is limited in geographical scope to portions of the Selway-Bitterroot Wilderness. Nonetheless, a proper ecological definition of the recovery area will not require new research or undue delays. We have invested two years (ca. 40 person-months of field work and 2000 well-distributed plots) in mapping vegetation throughout the Salmon-Selway (wilderness cores and fringing public lands). Our GIS contains the same types of layers as Davis and Butterfield (land cover, hydrography, roads, ownership, etc.) but uses more recent (Landsat TM) imagery, benefits from cutting-edge methods of image analysis, recognizes more cover classes, has a smaller minimum mapping unit (5 acres in uplands and 1 acre in riparian zones), and incorporates statistical innovations involving (I) prediction of the understory in addition to canopy and (ii) spatial analyses of the accuracy (error rate) of the understory and canopy classifications.

Thank you for your careful consideration of these comments.

Sincerely,

John J. Craighead
Founder/Board Chair

John T. Hogg
Science Director/Research Biologist

John W. Craighead
Research Biologist

Marcy Mahr
Research Biologist

Noel Weaver
Research Biologist

cc: Bitterroot Ecosystem Grizzly Bear Recovery EIS Team members